

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21-CR-209

SALVADOR LEZAMA, et al.,

Defendants.

PROTECTIVE ORDER

Upon the motion of the United States of America, by its attorneys, Richard G. Frohling, United States Attorney, and Bridget J. Schoenborn, Assistant United States Attorney for said district, and upon the Statement of Assistant United States Attorney Bridget J. Schoenborn, submitted ex parte and under seal pursuant to Rule 16(d)(1), Federal Rules of Criminal Procedure,

IT IS ORDERED THAT:

(1) One copy of the discovery materials, such as investigative reports, witness interviews, etc., shall be disseminated to each defense attorney. Said materials may mask the identification of certain cooperating witnesses, as well as the addresses, telephone numbers, and other identifying information relative to those persons. As

additional materials become available, and/or it becomes appropriate for the identity of certain persons to be disclosed, the defense attorneys will be notified by the United States Attorney's Office, and one copy of the additional materials will be made available to the defense attorneys.

(2) The defense attorneys may make copies of the discovery materials as necessary to prepare the defense of the case. All discovery materials, including necessary copies, shall remain under the control of the defense attorneys. Discovery materials, while in the custody and control of the defense attorneys, may be reviewed by the defendant represented by a defense attorney, licensed investigators employed by the defense attorney, and any other individuals deemed necessary by the defense attorney. Copies of the witnesses' statements or statements produced in discovery may be relinquished to licensed investigators employed by the defense attorney for limited periods of time as necessary to facilitate an investigation interview with that witness. Copies of the discovery materials filed with the court must be filed under seal to retain the confidential nature of the materials unless consent to filing in the public record is obtained from an attorney for the government. All materials produced or copied under the proposed order must be returned to the United States Attorney at the conclusion of the case, which may include time for appeal and resolution of a timely 28 U.S.C. § 2255 petition. Unless otherwise ordered above, the discovery materials shall not be

relinquished or disseminated, physically or electronically, to any third party, including clients, investigators, or any other individual.

(3) The government shall make arrangements with any and all institutions where the defendants may be held in federal custody so that a set of discovery materials can be maintained at each institution for inspection by the defendants. The defendants are prohibited from copying the materials or maintaining personal copies of any such materials and shall be prohibited from transporting any of these materials to their cellblocks.

Dated at Milwaukee, Wisconsin this 8th day of March, 2022.


WILLIAM E. DUFFIN
U.S. Magistrate Judge